

# **EXHIBIT D**

## Exhibit D

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#### **Immigration Detainees who participated in the Voluntary Work Program at the Northwest Detention Center may be affected by a class action lawsuit**

A class action lawsuit has been filed in federal court in Tacoma, Washington, against The GEO Group, Inc., the owner and operator of the Northwest Detention Center. The name of the case is *Nwauzor, et al. v. The GEO Group, Inc.*, No. 17-cv-05769. A federal judge decided that this lawsuit should be a class action on behalf of a “Class” or “Class Members” that includes all civil immigration detainees who participated in the Voluntary Work Program at the Northwest Detention Center at any time since September 26, 2014.

This lawsuit is about whether GEO is an ‘employer’ and whether the Class Members are ‘employees’ under the Washington Minimum Wage Act. And if so, whether GEO violated the Act by failing to pay Class Members the minimum hourly wage under Washington law for work performed under the \$1-a-day Program. GEO denies the allegations made in the lawsuit. The Court has not decided whether GEO did anything wrong. There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now.

The Court appointed the law firms of Schroeter Goldmark & Bender, Open Sky Law, PLLC, and Menter Immigration Law PLLC of Seattle, WA, and the Law Office of R. Andrew Free of Nashville, TN, to represent the Class. You may also hire your own lawyer to appear in Court on your behalf.

You have a choice of whether to stay in the Class or not, and **you must decide this now**. If you stay in the Class, you will be legally bound by all orders and judgments of the Court, and you won’t be able to sue, or continue to sue, GEO as part of any other lawsuit for back wages owed between September 26, 2014, and the date of settlement or jury verdict. To stay in the Class, you do not have to do anything now.

If you ask to be excluded from the Class, you cannot get any money or benefits from this lawsuit, but you will keep any rights to sue GEO for these claims and will not be bound by any orders or judgments of the Court. To ask to be excluded, send a letter, fax, or email to the address below, **postmarked by March 24, 2020**, requesting to be excluded from *Nwauzor v. The GEO Group, Inc.*:

c/o JND Legal Administration  
P.O. Box 91350  
Seattle, WA 98111

Email: info@vwpclassaction.com

Fax: (206) 788-8766

If you have any questions or want a detailed notice or other documents about this lawsuit and your rights, call 206-806-6835; visit [www.VWPClassAction.com](http://www.VWPClassAction.com); or email JND Legal Administration at info@VWPClassAction.com.